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January 2, 2024

Via ECF

The Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street, Room 24A
New York, NY 10007

Re: Collins v. Hanesbrands Inc., Case No. 1:23-cv-01818-CM

Dear Judge McMahon:

I represent Plaintiff in the above-captioned action. Together with counsel for Defendant, the parties jointly write to request a 60-day stay of proceedings in this matter in order for the parties to focus their efforts on potential resolution through private mediation. Prior to the expiration of the stay, the Parties will jointly file a status report to inform the Court of their progress.

In the event the Court wishes to proceed as scheduled, the parties hereby jointly submit the attached proposed Case Management Plan in advance of the January 4, 2023 Initial Conference. Should the Court choose not to cancel the Initial Conference, the Parties hereby request to appear at the Initial Conference via telephone. Appearances via telephone would serve the interests of the case and the Court because they would allow the Parties to minimize travel time and expenses which could otherwise be directed towards a potential resolution of the matter. Thank you for your attention to this matter.

Respectfully,

Y. Kopel

Yitzchak Kopel

CC: All counsel of record via ECF

Encls.

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1/3/2024
This case is already
10 months old and happened.
nothing has happened.
~~nothing has happened.~~
~~nothing has happened.~~

Colleen McMahon

You may
have a 60 day
stay & please settlement.
You then have 90 days &
be done with all discovery.
no motion will
stay discovery on